

**ATTACHMENT B**

**AFFIDAVIT OF HOMELAND SECURITY INVESTIGATIONS**  
**SPECIAL AGENT CHARLES ROGENER**

I, Charles Rogener, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent employed by Homeland Security Investigations (“HSI”) and have been so employed since February 2019. I am currently assigned to the HSI office in Springfield, Missouri. I am a graduate of the Criminal Investigator Training Program and of the HSI Special Agent Training where I was trained to investigate violations of federal law. I have also received specialized training in computer evidence recovery, and my duties include forensic analysis of electronic devices. I have further received training and gained experience in the use of various surveillance techniques and the application for and execution of various search, seizure, and arrest warrants, including search warrants of residences and businesses.
2. Prior to becoming a Special Agent, I was employed by Immigration and Customs Enforcement, Enforcement and Removal Operations as a Deportation Officer from July 2006 to February 2019. For two years of my time as a Deportation Officer, I served as a Task Force Officer with the Federal Bureau of Investigation’s (“FBI”) Safe Streets Task Force, where I was deputized to enforce violations of Titles 18 and 21 of the United States Code. As an FBI Task Force Officer, I participated in several investigations targeting narcotics traffickers and violent gang members. Additionally,

I have a Bachelor of Science in Information Technology and a certification in Information System Security from the University of Phoenix.

3. Among other duties, I am currently participating in an investigation relating to allegations of violations of federal laws, including Title 18, United States Code, Section 875(c) (interstate communications containing threat to injure the person of another).
4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents, witnesses, and agencies. This affidavit is intended to show merely that there is sufficient probable cause for the requested criminal complaint. It does not set forth all of my knowledge, or the knowledge of others, about this matter. This affiant has set for the facts necessary to establish probable cause to believe that Gabriel Ramsey (the “SUBJECT”) has violated 18 U.S.C. § 875(c), that is, interstate communications containing a threat to injure the person of another.

#### **STATUTORY AUTHORITY**

5. Title 18, United States Code, Section 875(c) makes it an offense to transmit in interstate or foreign commerce any communication containing any threat to kidnap any person or any threat to injure the person of another.

#### **PROBABLE CAUSE**

6. Between January 28 and 30, 2025, Offices of Immigration and Customs Enforcement (“ICE”) located in Philadelphia, Pennsylvania; York, Pennsylvania; and San Diego,

California received threats from the email address gmramsey@mindspring.com. The emails stated:

Tom Homan needs to be shot in the head and bleed out real fucking slow so that he has time to think about what a piece of shit he is.

ICE is not about protecting the American people. It is about loudly and visibly removing as many people of color from this country as possible and doing so with great cruelty. It's about sending dumbshit cops with firearms and high school egos into the community to terrorize as many people as possible, to show America who is "really" in charge. For you fascist fucks and your fascist masters, the cruelty is the point.

There are no more rules. If it is accepted for violent right wing fuckjobs like you and your peers to storm the capital to actively interfere with democratic processes, and be rewarded for it, and then to be further resourced to go terrorize the community (particularly vulnerable populations), not just to terrorize them but to cause fear in the rest of the population, as is what is happening now to show that the people need to get in line or they're going to be harmed by the regime, then everyone gets to fight in the same way. There are no more rules, law or norms. That is what your master has told us. "Crime" doesn't matter anymore and all that matters is raw strength. That is how authoritarianism works. That is what your master has said are the rules, and you are now playing

by them too. I'll play by those rules as well, just like centuries of resistance to authoritarian rule teaches me. It is not wise to sit back and wait, and say "oh it's just drama" "oh, it will be fine" – no, that's how you wake up in a concentration camp and society falls apart. It took Hitler 5 months to disassemble the Weimar Republic, using the functional system itself.

You are the threat. The threat needs to be eliminated.

ICE are not heroes. They are the enemy. I hope every agent in your field office gets fucking beaten to death with a tire iron. Fucking fascist cunts  
Nothing matters anymore. I am going to light myself on fire.

Gabriel M. Ramsey

gmramsey@mindspring.com

415-533-0783

7. On January 30, 2025, the Fresno, California Office of Enforcement and Removal Operations received threats telephonically from telephone number (415) 533-0783. The caller identified himself as the SUBJECT and claimed that he wanted all ICE employees to be shot in the head starting with Tom Homan. The SUBJECT stated that he was calling from a tent and might be outside the Fresno office. The SUBJECT further stated that he wanted to harm himself and others, but that the ICE employee would have to guess in which order he intended to accomplish that.

8. The SUBJECT claimed to have made “hundreds and hundreds” of threats, starting with ICE offices. Specifically, the SUBJECT claimed to have emailed every ICE Office of Principle Legal Counsel. The SUBJECT also claimed to have called United States Secret Service (“USSS”) soliciting advice on how to assassinate the President and asking the USSS agents to assassinate the President. Finally, the SUBJECT stated that he was not actively trying to assassinate the President of the United States because, “that Pennsylvania kid” made it too complicated, but if he had a Glock and Donald Trump was right in front of him, he would assassinate the President.
9. On January 30, 2025, the Denver, Colorado Office of Enforcement and Removal Operations received at least two calls from telephone number (415) 533-0783. During a subsequent interview, the recipient of these calls advised me that the caller stated he would, “shoot every single one of you in the head.” The SUBJECT further stated that, “I will kill you and your family,” and also that, “I will kill everyone that works at ICE.”
10. On January 30, 2025, agents from Homeland Security Investigations (“HSI”) Springfield and officers from the Springfield, Missouri, Police Department knocked at 1247 East Smith Street, Springfield, Greene County, Missouri 65803, which was believed to be the residence of the SUBJECT’s father. A white male adult, later identified as Daniel Ramsey, answered the door and confirmed that the SUBJECT was inside. Mr. Ramsey invited the agents into his home and advised them which room the SUBJECT was located in.

11. In response to a knock on the door, the SUBJECT came out of the room and began yelling about all of the fascists in his father's house. The SUBJECT confirmed calling and emailing ICE offices and reiterated some of the statements made in the emails such as wanting all ICE employees to be shot in the head. The SUBJECT claimed that all ICE employees are "SS" officers and needed to be stopped to avoid slipping into an authoritarian regime. From the context of the conversation, I believe that the SUBJECT was comparing ICE employees to the historical organization, "Schutzstaffel," a paramilitary component of the Nazi party.
12. The SUBJECT stated that he has neither the means nor the intent to act on his threats, but that he has been making threats to ICE employees because he wants them to feel uncertain about their safety whenever they conduct immigration enforcement. When asked if he personally wanted to harm ICE employees, the SUBJECT replied that the agents would just have to guess. The SUBJECT was then handcuffed by the Springfield, Missouri, Police Department officers and transported to the Green County Jail.
13. On the evening of January 30, 2025, agents from HSI Springfield executed a federal search warrant at the SUBJECT's bedroom within 1247 East Smith Street, Springfield, Greene County, Missouri 65803. Pursuant to the warrant, HSI seized three electronic devices and a notepad with, "To Do" written on the top page. The page also included a telephone number later identified as the ICE tip line, as well as the words, "Call Field Offices" and a list of cities.


14. Based upon the evidence set forth herein, this affiant believes there is probably cause in support of a criminal complaint against Gabriel Ramsey for violation of 18 U.S.C. § 875(c) (interstate communications containing threat to injure the person of another).

Further Affiant Sayeth Naught.



Charles Rogener  
Special Agent  
Homeland Security Investigations

Sworn to and subscribed to before me in my presence via telephone on this 31st day of January 2025.

  
The Honorable Willie J. Epps, Jr.  
Chief United States Magistrate Judge  
Western District of Missouri